

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,)	C.A. NO. 04-11193NG
Plaintiff)	
)	
v)	
)	
TIMOTHY CALLAHAN, ET AL.)	
Defendant(s))	
)	

MOTION IN LIMINE RE: TESTIMONY OF GATEWOOD WEST CONCERNING WITNESS NOTES

Now comes the Plaintiff and moves this Court to order the Defendants not to argue, introduce evidence concerning or suggest to the jury that they can draw an adverse inference against the Plaintiff because Gatewood West allegedly wrote certain notes which she allegedly provided to Attorney Scapicchio and which Attorney Scapicchio allegedly destroyed. In support thereof, the Plaintiff says that all three of the premises of the argument proffered by the Defendants in their Motion for Sanctions or Jury Instructions are unsupported by the evidence. In support thereof, Plaintiff has submitted Memorandum of Law in Support of Motion In Limine Re: Testimony of Gatewood West Concerning Witness Notes.

Respectfully submitted,

By His Attorneys,

/s/ Michael Reilly

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